

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DIGNA RUIZ, on behalf of herself and all
others similarly situated,

Civ. No.: 10-cv-5950 (JGK) (THK)

Plaintiff,

Judge John G. Koeltl

v.

Magistrate Judge Theodore H. Katz

CITIBANK, N.A.,

Defendant.

FREDERICK WINFIELD, et al.,

Civ. No: 10-cv-7304 (JGK) (THK)

Plaintiff,

v.

CITIBANK, N.A.,

Defendant.

**DECLARATION OF MURIELLE J. STEVEN WALSH
IN SUPPORT OF PLAINTIFFS' MOTION FOR
CONDITIONAL CERTIFICATION AS AN FLSA COLLECTIVE ACTION AND FOR
COURT-AUTHORIZED NOTICE TO SIMILARLY SITUATED INDIVIDUALS**

I, Murielle J. Steven Walsh, declare as follows:

1. I am a member of Pomerantz Haudek Grossman & Gross LLP, attorneys for Plaintiff Digna Ruiz in the above-captioned litigation, and an attorney in good standing admitted to practice in the State of New York and before this Court. I make and submit this declaration in support of Plaintiffs' Motion for Conditional Certification as an FLSA Collective Action and for Court-Authorized Notice to Similarly Situated Individuals.

2. Attached as Exhibit 1 is a true and correct copy of an excerpt from a hearing with Magistrate Judge Katz on March 30, 2011.

3. Attached as Exhibit 2 is Plaintiffs' proposed Notice of Collective Action pursuant to the Fair Labor Standards Act, 29 U.S.C. § 216(b).

4. Attached as Exhibit 3 is a true and correct copy of the complaint in *Ruiz v. Citibank, N.A.*, Civ. No. 10-cv-5950 (JGK) (THK).

5. Attached as Exhibit 4 is a true and correct copy of the complaint in *Winfield v. Citibank, N.A.*, Civ. No. 10-cv-7304 (JGK) (THK).

6. Attached as Exhibit 5 is a true and correct copy of an excerpt from a hearing with Magistrate Judge Dolinger on November 2, 2010.

7. Attached as Exhibit 6 is a true and correct copy of a letter from Thomas A. Linthorst, to Murielle J. Steven Walsh, dated April 22, 2011.

8. Attached as Exhibit 7 is a true and correct copy of Confidential Material Redacted
Confidential Material Redacted

9. Attached as Exhibit 8 is a true and correct copy of Confidential Material Redacted
Confidential Material Redacted

10. Attached as Exhibit 9 is a true and correct copy of Confidential Material Redacted
Confidential Material Redacted

11. Attached as Exhibit 10 is a true and correct copy of Confidential Material Redacted
Confidential Material Redacted

12. Attached as Exhibit 11 is a true and correct copy of Confidential Material Redacted
Confidential Material Redacted

13. Attached as Exhibit 12 is a true and correct copy of Confidential Material Redacted
Confidential Material Redacted

14. Attached as Exhibit 13 is a true and correct copy of Confidential Material Redacted
Confidential Material Redacted
15. Attached as Exhibit 14 is a true and correct copy of Confidential Material Redacted
Confidential Material Redacted
16. Attached as Exhibit 15 is a true and correct copy of Confidential Material Redacted
Confidential Material Redacted
17. Attached as Exhibit 16 is a true and correct copy of Confidential Material Redacted
Confidential Material Redacted
18. Attached as Exhibit 17 is a true and correct copy of Confidential Material Redacted
Confidential Material Redacted
19. Attached as Exhibit 18 is a true and correct copy of Confidential Material Redacted
Confidential Material Redacted
20. Attached as Exhibit 19 is a true and correct copy of Confidential Material Redacted
Confidential Material Redacted
21. Attached as Exhibit 20 is a true and correct copy of Confidential Material Redacted
Confidential Material Redacted
22. Attached as Exhibit 21 is a true and correct copy of a CNNMoney.com article entitled "Citigroup to Hack 17,000 Jobs," dated April 11, 2007.
23. Attached as Exhibit 22 is a true and correct copy of a Finance Trading Times article entitled "Citibank Lay Off Job Cut," dated November 17, 2008.
24. Attached as Exhibit 23 is a true and correct copy of Confidential Material Redacted
Confidential Material Redacted

25. Attached as Exhibit 24 is a true and correct copy of [Confidential Material Redacted]

[Confidential Material Redacted]

26. Attached as Exhibit 25 is a true and correct copy of [Confidential Material Redacted]

[Confidential Material Redacted]

27. Attached as Exhibit 26 is a true and correct copy of a Bloomberg article entitled "Citigroup's Pandit Targets 52,000 Jobs to Eliminate," dated November 17, 2008.

28. Through April 29, 2011, four individuals have signed declarations describing their experiences as former Personal Bankers employed by Citibank. These individuals worked at Citibank branch locations in Okeechobee, Florida; Palm Beach Gardens, Florida; Garden City, New York; Reston, Virginia, and Philadelphia, Pennsylvania.

29. Attached are true and correct copies of the following documents:

a. Attached as Exhibit 27 is the Declaration of Craig Z. Ash (Okeechobee and Palm Beach Gardens, Florida).

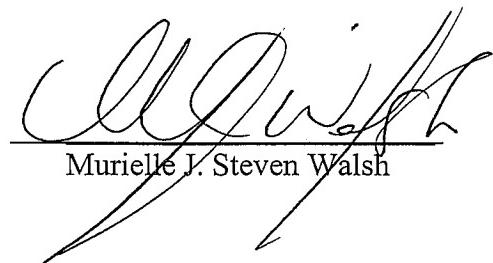
b. Attached as Exhibit 28 is the Declaration of Shavonn V. Handy (Garden City, New York).

c. Attached as Exhibit 29 is the Declaration of Tamoor Ijaz (Reston, Virginia).

d. Attached as Exhibit 30 is the Declaration of Lashonda Wilson (Philadelphia, Pennsylvania).

I declare under penalty of perjury that the foregoing is true and correct.

Executed in New York, New York on April 29, 2011.



A handwritten signature in black ink, appearing to read "Murielle J. Steven Walsh". The signature is fluid and cursive, with a horizontal line underneath it.

Murielle J. Steven Walsh